



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

BGK/LDM
F. F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 17, 2025

By ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Linda Sun and Chris Hu
Criminal Docket No. 24-346 (S-2) (BMC)

Dear Judge Cogan:

The government respectfully submits this letter to offer to file—to the extent such a submission may be helpful to the Court—a further response to the defendants’ reply in support of their motion for a *Monsanto* hearing and the more than 5,500 pages of supporting financial documents that the defendants filed (ECF No. 127), in order to address with more specificity the contents of those documents now that the defendants have filed them with the Court (after having previously failed to do so, as the government noted in its opposition to their motion (ECF No. 118 at 11)). As the defendants confirmed in the Notice filed on July 14, 2025 (ECF No. 134), the financial documents they filed consist of the same unsworn disclosures that they provided to the government months ago and which, for reasons previously discussed in the government’s opposition to the defendants’ motion, are deficient. (ECF No. 118 at 11-12). To assist the Court’s review, now that the defendants have filed the unsworn disclosures, the government can provide citations to specific pages that show that the defendants have access to other unrestrained assets, and that they have failed to adequately explain why those assets cannot be used to fund their defense.

The government will prepare such a submission promptly upon the Court's request.

Respectfully submitted,

JOSEPH NOCELLA, JR.
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cc: Clerk of the Court (BMC) (by ECF)
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